

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
WARREN JONES and WENDY JONES,	:	
<i>Debtors</i>	:	Case No. 21-22563-CMB
WARREN JONES and WENDY JONES,	:	
<i>Movants,</i>	:	Doc. No. _____
vs.	:	
ASHLEY FUNDING SERVICES, LLC., CAPITAL ONE N.A., COMENITY BANK/JUSTICE,	:	Filed under Section
COMMUNITY LOAN SERVICING, LLC., DESIGNED RECEIVABLE SOLUTIONS,	:	362(c)(3) of the
DUQUESNE LIGHT COMPANY, ECMC, GM FINANCIAL, HP SEARS, INTERNAL	:	Bankruptcy Code
REVENUE SERVICE, JEFFERSON CAPITAL SERVICES, LLC., KAY JEWELERS,	:	
KEYBRIDGE MEDICAL REVENUE CARE, MONROEVILLE MUNICIPAL AUTHORITY,	:	
NATIONAL CREDIT ADJUSTERS, LLC., PENNSYLVANIA DEPARTMENT OF REVENUE,	:	
PEOPLES NATURAL GAS COMPANY, LLC., PORTFOLIO RECOVERY ASSOCIATES,	:	
LLC., SANTANDER CONSUMER USA, SYNCHRONY BANK, TD BANK, USA/TARGET	:	
CREDIT CARD, VERIZON, WESTLAKE FINANCIAL SERVICES and WFFINANCIAL,	:	
<i>Respondents</i>	:	

DEBTORS' MOTION TO EXTEND THE AUTOMATIC STAY UNDER
SECTION 362 (c)(3) OF THE BANKRUPTCY CODE

AND NOW comes the Debtors, WARREN JONES and WENDY JONES, by and through the Debtors' Attorney, MICHAEL S. GEISLER, ESQUIRE, and file this Motion, of which the following is a statement:

1. Movants are the Debtors.
2. The Debtors filed a Chapter 13 Petition on 12/1/2021.
3. The Debtors have had one (1) pending prior bankruptcy proceeding in the past year. A Chapter 13 Case was filed at Case No. 19-24383-CMB on 9/2/2019 and was dismissed on 7/30/2021 for the failure to make plan payments.
4. The automatic stay will expire on 12/31/2021.
5. The Debtors believe there have been changed circumstances as follows:
 - a. The prior case was dismissed because of the failure of the Debtors to make plan payments.
 - b. The Debtors now have sufficient income to make payments.

WHEREFORE, the Debtors pray that this Court enter an order extending the automatic stay.

/s/ Michael S. Geisler

DATED: 12/8/2021

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